

Brent R. Baker (5247)  
Brennan J. Curtis (16433)  
**PARSONS BEHLE & LATIMER**  
201 South Main Street, Suite 1800  
Salt Lake City, Utah 84111  
Telephone: 801.532.1234  
Facsimile: 801.536.6111  
[bbaker@parsonsbehle.com](mailto:bbaker@parsonsbehle.com)  
[bcurtis@parsonsbehle.com](mailto:bcurtis@parsonsbehle.com)  
[ecf@parsonsbehle.com](mailto:ecf@parsonsbehle.com)

*Attorneys for Defendants Brendan J. Stangis*

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION**

---

SECURITIES AND EXCHANGE  
COMMISSION,

Plaintiff,

v.

DIGITAL LICENSING INC., *et al.*,

Defendants.

---

**DEFENDANT BRENDAN J. STANGIS'  
JOINDER IN OPPOSITION TO SEC'S  
MOTION TO DISMISS WITHOUT  
PREJUDICE AND VACATE  
HEARING ON MOTIONS TO  
DISMISS**

Case No. 2:23-cv-00482-RJS

Judge Robert J. Shelby

---

Defendant Brendan J. Stangis (“Defendant” or “Stangis”), by and through counsel of record, hereby submits this Memorandum in Opposition to Plaintiff Securities and Exchange Commission’s (“SEC” or the “Commission”) Motion to Dismiss Action without Prejudice and to Vacate Upcoming Hearing (“SEC’s Motion to Dismiss”). [Dkt. 260]. Pursuant to DUCivR 7-1(a)(7), to avoid repetition and duplication, Stangis joins “iX Global Defendants” (comprised of Defendants iX Global, LLC, Joseph A. Martinez, and Travis Flaherty) in their Memorandum in Opposition to the SEC’s Motion to Dismiss. [Dkt. 264]. Stangis also joins Defendants Digital

Licensing, Inc., Jason R. Anderson, Jacob S. Anderson, Schad E. Brannon, Roydon B. Nelson, and Relief Defendants Business Funding Solutions, LLC, Blox Lending, LLC, The Gold Collective, LLC, and UIU Holdings, LLC's (collectively, the "DEBT Box Defendants") in their opposition to SEC's Motion to Dismiss. [Dkt. 261]. The arguments made by iX Global Defendants and the DEBT Box Defendants equally apply to Stangis and he hereby adopts and incorporates those arguments here.

DATED this 15th day of February, 2024.

**PARSONS BEHLE & LATIMER**

*/s/ Brent R. Baker*

---

Brent R. Baker  
Brennan J. Curtis

*Attorneys for Defendant Brendan J. Stangis*

**CERTIFICATE OF SERVICE**

On this 15th day of February 2024, I hereby certify that I electronically filed a true and correct copy of the foregoing with the Clerk of the Court using the CM/ECF system, which sent notification and service to all counsel of record.

/s/ Brent R. Baker